

REMARKS

The Examiner has rejected claims 1-9 under 35 U.S.C. § 102(e) as being anticipated by the disclosure of Davis et al. (U.S. Patent no. 6,578,013). Applicant requests that the Examiner reconsider the rejection of claims 1-9 in light of the following comments. For the following reasons, Applicant requests that the Examiner withdraw the rejections.

Rejection under 35 U.S.C. § 102(e)

It is well established that a claim is anticipated under 35 U.S.C. § 102(b) only if the identical invention is shown in complete detail as defined by the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). As the following will demonstrate, the rejected claims contain subject matter not disclosed or suggested by U.S. Patent no. 6,578,013.

U.S. Patent 6,578,013 relates to generation of a compatible order for a computer system. Thus, in supplier database 610, supplier administrator 502 maintains records of configuration for various computing systems (e.g., clients 202, 204 and 206) owned or leased by customers (e.g. customer 102) (see col. 14, lines 15-21, Figs. 7, 8a, 8b).

Supplier administrator 502 automatically identifies situations in which new improved items (e.g., software upgrades, additional electronic circuitry, peripheral hardware devices) become available for compatible installation at customers' existing computing systems. In response to identifying such situations, supplier administrator 502 automatically outputs messages to customers (e.g., to customer administrator 214 via network 110) for describing the situations. In that manner, supplier administrator 502 automatically prompts the customers to order items from supplier 112 (see col. 14, lines 22-34).

However, Davis et al is completely silent on how the supplier administrator determines whether or not such a new item is suitable for compatible installation as claimed by Applicant. Similarly, Davis et al does not provide any description as to how the supplier administrators handle multiple suppliers/manufacturers. The absence of any such descriptions in Davis et al suggests that Davis et al relies on the prior art methods of cataloguing items provided by

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different manufacturers. Therefore, the cited document is largely irrelevant in the context of the data management system invention of the Applicants.

Furthermore, Applicants submit that the Examiner has attempted to equate suppliers/manufacturers claimed by Applicants with the customer database in Davis et al. Applicants respectfully suggest that such an attempt is improper because no prior art reference has been cited that teaches or enables each of the claimed elements, arranged as in claims 1-9.

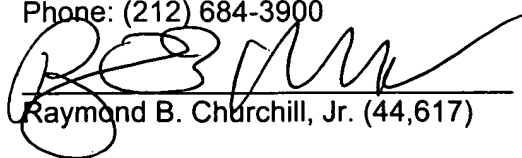
For example, the Examiner states that "Davis et al teaches creating and modifying data relating to components specific to that supplier...(see col. 2, lines 41-66)" as claimed in claim 1. This assertion is clearly wrong, as col. 2, lines 41-66 describe customers 102, 104, and 106 only.

Further, the suppliers/manufactures of computer items (e.g., DVDs, Zip drives, etc.) in Davis et al neither export 'modified data portions' to the supplier administrators nor receive 'exported product identifiers' from the supplier administrator as claimed in claim 2. The supplier administrator in Davis et al simply consolidate multiple customer records into a single customer database without any interaction with other suppliers/manufacturers of computer items.

Therefore, we submit that the Applicants' invention is not anticipated by the cited reference. Accordingly, it is respectfully submitted that the application presents novel and non-obvious subject matter and is in condition for allowance. Early and favorable allowance is requested.

Respectfully submitted,
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